

TOWN OF HINGHAM

OFFICE OF SELECTMEN

Paul K. Healey, Chairman
Paul J. Gannon
Mary M. Power



Ted C. Alexiades
Town Administrator

June 1, 2016

Jessica L. Malcolm, 40B Specialist
MassHousing
One Beacon Street
Boston, MA 02108

Re: Broadstone Bare Cove, Hingham, MA
MH ID No. 827

Dear Ms. Malcolm:

Thank you for the opportunity to comment on the application for a Site Approval Letter submitted to MassHousing by Broadstone Bare Cove Alliance, LLC in connection with a proposed housing development to be located at 230 Beal Street, in Hingham, Massachusetts. The Board offers the following information for your agency to consider in developing its Findings with respect to Project Eligibility.

Project Description

The subject property consists of approximately 12.06 acres located on the southerly side of Beal Street and adjacent to Lynch Fields, Bare Cove Park, and property owned by the Massachusetts Department of Fisheries and Wildlife. Along the easterly boundary, only Sheltry Path located in Bare Cove Park (a width of approximately 30') separates the site from the Back River Townhomes neighborhood. The rear portion of the property is affected in part by wetland resource and riverfront areas. A 43,600+/- SF office building and related improvements occupies the center of the property, while the front remains largely undeveloped.

The conceptual plan depicts a multifamily development consisting of 300 rental units. The units will be located within two, five-story apartment buildings. The proposal also includes a total of 476 parking spaces to be located both within a structured parking garage and surface parking lots placed along the shared property line with Lynch Fields and Bare Cove Park. The development would be accessed from Beal Street via a 26'-wide site drive in the approximate location as the existing.



According to the application, twenty-five percent, or 75 of the units, will be made available to households earning less than eighty-percent area median income.

Compliance with Comprehensive Permit Regulations

The property is located in the Office Park zoning district, which permits certain institutional, educational, recreational, industrial and appropriate business uses. Local regulations prohibit all residential uses within the Office Park district. The Office Park zoning designation on the subject property was the result of a comprehensive planning process conducted by the Town in the 1970s for a 750-acre former naval ammunition depot. Based on input received through the study, Town Meeting rezoned the entire area, allocating more than 100 acres to multifamily and affordable housing. A total of 44 acres were included in the Office Park. This area was reduced in the 1980s due to a taking by the Massachusetts Department of Public Works and a conveyance by a prior owner to the Division of Fisheries in Wildlife.

Other areas of the former depot that were originally zoned for housing have been built-out. The resulting building typology along the south side of Beal Street specifically consists of 2.5-story, multi-family townhouse-style development with an average density of 8 units/acre. The conceptual plan, which depicts 5-story apartment buildings with a proposed density of 25 units/acre is inconsistent with the surrounding residential development.

Sustainable Development Characteristics

The property is served by both public water and sewer infrastructure. Public transportation options, including the MBTA commuter boat, commuter rail, and bus, are available within close proximity to the site. These characteristics make the property an ideal location for the existing office use and other permitted institutional, educational, recreational, or industrial uses. The proposed development site is the only Office Park zoning district located in the northern side of Hingham. The Town has demonstrated a consistently thoughtful approach to planning in the immediate area, providing significant opportunities to create mixed-income, multifamily housing.

Local Needs and Prior Municipal Action

The Town of Hingham, with professional support from the Metropolitan Area Planning Council (MAPC) provided through a U.S. Department of Housing and Urban Development Sustainable Communities Grant, recently completed a planning effort to update the 2001 Hingham Master Plan. Respondents to a public opinion survey specifically identified the Hingham Shipyard area as the preferred location for future affordable and market rate housing development. The Hingham Board of Appeals issued a Comprehensive Permit on May 17, 2016, for a 190-unit multifamily development on a parcel immediately adjacent the Hingham Shipyard.

The Town has added significantly to its rental housing stock, including affordable units, in recent years. Hingham's renter households grew by 74% from 2000-2010, whereas renter households grew by just 5.4% in Plymouth County and 2.6% statewide.

In terms of affordable housing development, the Town has taken decisive steps intended to meet its local housing needs. In 2009, the Town exercised its right of first refusal to purchase the Lincoln School Apartments, which consists of 60 affordable units located in downtown Hingham, from the Glastonbury Abbey. The Hingham Affordable Housing Trust supported legal and financial services required to secure a \$6.7 million general obligation bond to complete the purchase. The acquisition ensured that the units would not be converted to market rate upon expiration of the project's financing.

The Hingham Board of Appeals has approved a number of Comprehensive Permit Applications in recent years, including Damon Farms (32 units total in Hingham and Norwell approved in 2008), Derby Brook (20 units total approved in 2009), Craftsman Village (8 units referenced above and approved in 2010), Village on Main (16 units total approved in 2014), and Avalon Hingham Shipyard II (190 units total approved in 2016).

Additionally, 101 Local Action Units have been created by Special Permit. A 91-unit affordable rental community was permitted through the Hingham Shipyard Redevelopment Mixed Use Special Permit in 2003. The following year, the Planning Board granted a Flexible Residential Development Special Permit for a development known as Ridgewood Crossing, which includes 3 age-restricted affordable homeownership units. Another Flexible Residential Development, Chestnut Gardens, was approved in 2005. A Local Action Unit Application is currently pending at the Department of Housing and Community Development for 2 three-bedroom detached condominiums within the development. In 2006, a Residential Multifamily Development known as Back River Townhomes was approved by the Zoning Board in 2006. Back River includes 5 affordable units.

Finally, Town Meeting has appropriated \$1,912,868 from the Community Preservation Fund for Community Housing Projects since 2003, including the following:

1. Creation of 6 housing units for veterans on Fort Hill Street (2010);
2. Acquisition and rehabilitation of single-family home on Scotland Street by the Hingham Housing Authority (2006, 2007, 2015);
3. Acquisition of property on Beal Street and completion of permitting for "Craftsman Village," which includes 2 affordable units, through Local Initiative Program (2010);
4. Allocation of funds to renovate a single-family dwelling on Whiting Street that was donated to the Town for affordable housing purposes (2016);
5. Support of a feasibility study, consulting services, and an architectural design for a 20-40 unit affordable rental development on property located on Beal Street and under the care of the Hingham Housing Authority; and
6. Transfer of funds to Hingham Affordable Housing Trust (2008, 2010, 2014, 2015, 2016). Funds supported the planning phase of a 20-40 unit affordable housing development on town-owned property known as the "Selectmen's Parcel." The Trust also used these funds to acquire a unit on Beal Street and then sold the unit to an eligible purchaser subject to a long term deed restriction (2015).

These Town-sponsored and/or Town-approved projects differ from the proposed in that the housing provided created is appropriate for the locations in which they are sited. The above-

referenced projects were developed with significantly less density and in locations more suited to the type of housing. The more dense Avalon Hingham Shipyard II development is denser than other recent projects, but appropriate in type and scale to immediately adjoining multi-family housing, while the proposed Project is not.

Project Specific Comments

Municipal staff and other local officials reviewed the conceptual plan and raised a number of concerns about the proposed development. Those items related to Project Eligibility are summarized below:

Traffic and Circulation

The Applicant will need to prepare a Traffic Impact Assessment with sufficient data, including traffic volumes, crash rates, and the safety and level of service (LOS) at the site entrance and area intersections, in order to assess the Project's potential traffic impacts on area roadways, and recommend necessary traffic improvements.

Local staff and area residents have identified a number of traffic concerns related to the Project location. Beal Street intersects with Lincoln Street/Rt. 3A approximately 500' to the northwest of the property. Left turns from Beal Street are prohibited at this location and right turns are hazardous, with safer alternative routes available. These limitations mean the Project would effectively be located at the end of a dead end street. The concern is compounded by the fact that the development itself would include a single entrance/exit with no secondary means of access proposed for either improved vehicular circulation or emergency responder access.

The site drive is also located opposite the Lincoln Plaza/Stop & Shop parking lot, which itself has a signalized intersection with Rt. 3A. While it would be illegal for potential future residents to utilize the Lincoln Plaza parking lot to access Rt. 3A, it would also be more convenient than the next closest intersection with William B. Terry Drive located approximately 675' to the southeast. Cut-through traffic generated by the Project also has the potential to create an unsafe condition in this already congested private parking lot.

A substantial reconfiguration of the Beal Street/Rt. 3A intersection would likely be the only way in which the volume of traffic generated by the Project could be handled by Beal Street without exacerbating existing conditions to a dangerous level and creating significant trespass on the private entrance drive at Lincoln Plaza.

Additionally, the adjacent Lynch Fields generate significant traffic, particularly during evenings and weekends. This traffic would not routinely overlap with that generated by allowed office/business users of the subject property, but it would conflict with peak evening and weekend traffic generated by the proposed residential Project. Vehicles also park on both sides of Beal Street during sporting events held at Lynch Fields. Additional traffic from the Project may increase danger to participants and spectators using the facility. The Applicant should consider installing a sidewalk on the southerly side of Beal Street

between the proposed site drive and the adjacent athletic fields to improve pedestrian safety.

Environmental and Archeological Impacts

The Project will be located in close proximity to an Area of Critical Environmental Concern (ACEC) within the adjoining Bare Cove Park, and surrounding property is subject to a 1987 Order of the Department of Environmental Management restricting work in this area. Town representatives expressed concern about potential negative impacts on this environmentally sensitive area resulting from light pollution and stormwater runoff from the Project. The Applicant should protect the back 4 acres of the property, which are not proposed to be disturbed, through a perpetual conservation restriction. Such a conservation restriction was contemplated when the adjoining land was taken by, and deeded, to the Commonwealth, and the area of the Project site that was to be covered by the restriction is shown on recorded plans.

The Massachusetts Historical Commission has identified the property as highly "archeologically sensitive" as it includes two recorded Native American archeological sites. The property also historically served as an almshouse and town farm. Town records include death certificates for more than 100 people who died while residing in the Almshouse. An 1832 vault, built into the hillside at the rear of the property, temporarily housed residents who died in winter. In the spring, the dead were moved to permanent grave sites on the Almshouse property. The Applicant should complete an archeological survey of the property to determine the burial locations of the Almshouse residents and develop an avoidance and protection plan to protect both the Almshouse gravesites and the Native American archeological sites.

Finally, the application describes how the Project was designed to take advantage of the adjoining recreational and open space areas, which will serve as an amenity for future residents. As such, the Applicant should sponsor improvements to the Bare Cove Park and/or Lynch Fields. The park in particular has limited financial and physical resources and the Project would increase the demand on those resources. Additional steps should also be taken to minimize impacts on the future residents (and therefore complaints raised to the Town) from the lighted recreational fields adjacent to the Project.

Public Safety

Public safety officials indicated that a secondary access to the development for emergency responders will be required. The Fire Department expressed concern about access to individual buildings as well. First, the main entrance of Building 1 is placed on its rear facade. This configuration would require first responders to drive completely around the building to access the main entrance. Second, the main road does not extend around the south side of Building 2 and therefore the Fire Department would be unable to access the back side of the garage. Since the garage is open on only a single facade, the Fire Department also expressed concern about ventilation of the space in the event of a vehicle fire, which would be necessary to prevent smoke and products of combustion from entering the occupied portions of the building.

Design Details

In general, the conceptual plan is inconsistent with the surrounding neighborhood context. Nearby residential development primarily consists of townhouse-style development that does not exceed 2.5 stories. Area commercial and industrial development similarly displays a much smaller scale than the proposed Project.

The proposed level of density is incompatible with the surrounding neighborhood. The number of residential units proposed results in an intensity of use that is approximately 3 times that of nearby residential developments. Additionally, the maximum permissible Floor Area Ratio (FAR) for the Office Park zoning district is 0.15, whereas the Project would result in a FAR greater than 1.0.

Thank you for the opportunity to comment on the Site Approval Application for the proposed Broadstone Bare Cove Project. Please do not hesitate to contact Thomas Mayo, the Assistant Town Administrator, in the Selectmen's Office at the number referenced above with any questions related to this correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul K. Healey". The signature is fluid and cursive, with a long, sweeping line extending from the end.

Paul K. Healey
Chairman

Cc: Thomas Mayo, Assistant Town Administrator
Susan Murphy, Special Town Counsel
Emily Wentworth, Senior Planner